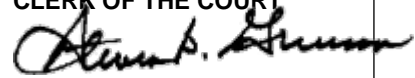


# EXHIBIT B

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**LIEN**

Sean K. Claggett, Esq.  
Nevada Bar No. 008407  
Jennifer Morales, Esq.  
Nevada Bar No. 008829  
CLAGGETT & SYKES LAW FIRM  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
(702) 655-2346 – Telephone  
(702) 655-3763 – Facsimile  
[sclaggett@claggettlaw.com](mailto:sclaggett@claggettlaw.com)  
[jmorales@claggettlaw.com](mailto:jmorales@claggettlaw.com)

**DISTRICT COURT  
CLARK COUNTY, NEVADA**

LOGAN ERNE, an Individual,

Plaintiff,

v.

CASE NO.: A-18-773499-C

DEPT NO.: III

MARGARET WILLIAMS, LCPC an Individual;  
MARILYN S. ABEL, CPC, an Individual;  
ANTHONY QUINN, M.D., an Individual,  
BRANDON PAYZANT, PAC, PHC OF  
NEVADA, INC. DBA HARMONY  
HEALTHCARE, a foreign corporation; and  
SUMMERLIN HOSPITAL & MEDICAL  
CENTER LLC, a limited liability company.;  
DOES I through X; ROE BUSINESS ENTITIES  
XI through XX, inclusive,

Defendants.

**NOTICE OF ATTORNEY'S LIEN**

NOTICE IS HEREBY GIVEN that CLAGGETT & SYKES LAW FIRM claims a lien for its services upon the claims for relief on behalf of LOGAN ERNE, and any successor and/or predecessor plaintiff in the above-referenced litigation, against any person, entity or insurance company legally liable for damages as a result of the incident occurring on April 26, 2017, that is now the subject of this lawsuit.

Claggett & Sykes Law Firm claims a lien and upon any and all property or gross amounts recovered (the recovery) that may become available on behalf of LOGAN ERNE and any successor and/or predecessor plaintiff in the above-referenced litigation:

**CLAGGETT & SYKES LAW FIRM**  
4101 Meadows Lane, Suite 100  
Las Vegas, Nevada 89107  
702-655-2346 • Fax 702-655-3763

<b>Jennifer Morales, Esq.</b>	<b>97.20 hours/\$72,900.00</b>
<b>Shannon L. Wise, Esq.</b>	<b>69.70 hours/\$27,880.00</b>
<b>Samuel Harding, Esq.</b>	<b>23.05 hours/\$17,287.50</b>
<b>Moises Garcia</b>	<b>32.50 hours/\$4,875.00</b>
<b>Jocelyn Abrego</b>	<b>48.70 hours/\$7,305.00</b>
<b>Total:</b>	<b>271.15 hours/\$130,247.50</b>

Claggett & Sykes Law Firm asserts a lien for attorney fees in the amount of **\$130,247.50**.

Claggett & Sykes Law Firm also asserts a lien against LOGAN ERNE for all reasonable case costs advanced and incurred on behalf of the plaintiff in the amount of **\$158,264.56**

Accordingly, Claggett & Sykes Law Firm asserts a total lien in this matter of **\$288,512.06** for attorney fees and costs.

DATED this 16<sup>th</sup> day of February 2021.

CLAGGETT & SYKES LAW FIRM

*/s/ Sean K. Claggett*

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Sean K. Claggett, Esq.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY THAT on the 16<sup>th</sup> day of February 2021, I caused to be served a true and correct copy of the **NOTICE OF ATTORNEY'S LIEN** in the above-captioned case via the following methods pursuant to Rule 9 of the N.E.F.C.R. and N.R.C.P. 5:

Robert C. McBride, Esq. Gerald Tan, Esq. <b>CARROLL KELLY TROTTER FRANZEN          MCBRIDE &amp; PEABODY</b> 8329 W. Sunset Road, Suite 260 Las Vegas, NV 89113 <i>Attorneys for Defendant Anthony Quinn, M.D.</i>	Travis E. Shetler, Esq. <b>LAW OFFICES OF TRAVIS E. SHETLER</b> 3202 W. Charleston Blvd Las Vegas, NV 8902 <i>Attorneys for Plaintiff</i>
S. Brent Vogel, Esq. <b>LEWIS BRISBOIS BISGAARD &amp; SMITH,          LLP</b> 6385 S. Rainbow Blvd., Suite 600 Las Vegas, NV 89118 <i>Attorneys for Defendants Margaret Williams,          LCPC, Marilyn S. Abel, CPC, Brandon          Payzant, PAC and PHC of Nevada, Inc., dba          Harmony Healthcare.</i>	Brian F. Davis, Esq. <b>DAVIS LAW GROUP, PA</b> 135 Cherry Street, N Asheville, NC 28801 <i>Attorneys for Plaintiff</i>
Michael J. Shannon, Esq. Brittany A. Lewis, Esq. <b>HALL PRANGLE &amp; SCHOONVELD, LLC.</b> 1140 North Town Center Drive, Ste. 350 Las Vegas, Nevada 89144 <i>Attorneys for Defendant, Summerlin Hospital          Medical Center, LLC</i>	<b>VIA Regular and Certified Mail</b> Logan Erne 51 Wilmington Street, Ashville, North Carolina 28806 <i>Plaintiff</i>
Candance C. Herling, Esq. <b>MESSNER REEVES, LLP</b> 8945 W. Russell Road #300 Las Vegas, NV 89148 <i>Attorneys for Defendant, Summerlin Hospital          Medical Center, LLC</i>	

/s/ Moises Garcia

An Employee of Claggett & Sykes Law Firm